

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

NO. 05-40025-FDS

UNITED STATES OF AMERICA

V.

MATTHEW MARSH

**ASSENTED TO MOTION TO CONTINUE CHANGE OF PLEA HEARING**

Now comes the Defendant, Matthew Marsh in the above-entitled matter respectfully requests that the change of plea hearing currently scheduled for September 11, 2006 be continued to September 28, 2006 at 9:00 a.m. The reasons for this motion are as follows:

1. We are still in the process of negotiating the terms of the plea agreement.
2. There are still some issues with the proposed plea agreement that need to be resolved.
3. I will then need to discuss the proposed plea agreement with my client who is currently incarcerated in the Plymouth County House of Corrections.
4. Plymouth is approximately 2 ½ hours from my office in Springfield, MA and I will need an entire day for travel time and then time to meet with my client.
5. It will take some time for me to work out scheduling in order to arrange for a full day to meet with my client at the Plymouth County House of Correction.
6. Once I have discussed the plea agreement with my client and if he agrees with the proposed agreement it will then need to be approved and signed by United States Attorney, Michael Sullivan.
7. We are requesting until September 28, 2006 to effectuate all of this.

/s/ Alan J. Black  
Alan J. Black, Esquire  
Law Offices of Alan J. Black  
1383 Main Street  
Springfield, MA 01103  
(413) 732-5381  
BBO # 533768

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the Assistant United States Attorney, Lisa Asiaf on this 8<sup>th</sup> day of September 2006.

/s/ Alan J. Black